



California State Fire Marshal CODE INTERPRETATION

Date Issued	January 6, 2006	Interpretation	05-025
Topic	R-2 Facilities with multiple housing units.		
Code Section(s)	2001 California Building Code, Section 310		
Requested by	Mark McCormick Deputy Chief/Fire Marshal Santa Rosa Fire Department 955 Sonoma Avenue Santa Rosa, CA 95404		

1.) California Building Code – 2001 edition, Section 310 – Requirements for group R Occupancies, Division 2.1 states, “Residentially-based, licensed facilities accommodating more than six non-ambulatory clients. CBC 203 defines a “building” as “any structure as to which state agencies have regulatory power, used or intended for supporting or sheltering any use or occupancy...” CBC Chapter 2 does not define “facility” however, CBC 1102A.6F defines “facility” as a building, structure, room, site, complex or any portion thereof, that is built, altered, improved to serve a particular purpose.

In the case of a campus style “facility” owned by a single entity which is requesting to be licensed for more than 6 non-ambulatory clients, and there are several separate buildings comprising no more than 5 independent residential living units (townhouse style) with staff working from another separate building, is it correct for the AHJ to classify this facility as an R-2.1 and/or is it the intent of the code to classify this “facility” as an R-2.1 since the “facility” desires to house and provide service/care for more than 6 non-ambulatory clients?

The word “facility” would constitute the entire campus. If the provider requested a single license for the entire facility, and the number of non-ambulatory clients exceeds six, the facility would be classified as an R-2.1. Each residential housing

unit with six or less residents would be classified as an R-2.1.1. However, individual living units that are part of a larger facility and depend on each other for evacuation assistance would be required to have an approved manual fire alarm system throughout the facility.

2.) CBC 1007.6.3.1.1 requires a minimum of two exits from buildings classified as R-2 occupancies. In the case of a building constructed in a "townhouse" style where there are 5 individual residential units, (Type V-N) separated by a one hour occupancy separation, each unit has one exit door (front door) where the sleeping room exits through the living/kitchenette room to the front door.

Is it the intent of the code that only one exit from each living space complies with the CBC 1007.6.3.2 for the arrangement of exits or would a second exit be required from the sleeping room to the outside or through another exit for non-ambulatory clients?

Each unit within the 5 unit building must have two exits as per 2001 California Building Code, Section 1007.6.3.1.1. Bedrooms in units housing non-ambulatory clients must comply with exiting arrangements as per Section 1007.6.3.2.2.